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8 Attorney for Plaintiff
9 IRMA RAMIREZ

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ,) CASE NO. 15-cv-03808-EMC
Plaintiff,)
v.)
APENA CORP, a California Corporation)
dba PLAZA TEQUILA TAQUERIA;)
DEMETRIOS GIANNIS, Trustee and)
ROSE GIANNIS, Trustee of the Giannis)
Family Trust,)
Defendants..)

Plaintiff and Defendants by and through their respective attorney of record, respectfully request and stipulate, as follows:

1. **Whereas**, defendants have been served with the summons and complaint and have answered plaintiff's complaint;
2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties are to have the Joint Site Inspection at the Plaza Tequila Taqueria, located at/near 19315 Highway 12, Sonoma, California, no later than December 3, 2015 . However, due to scheduling conflicts and the holidays, the parties are unable to conduct the General Order 56 Joint Site Inspection by the December 3rd deadline.
3. **Therefore**, in light of the above, the parties have agreed to reschedule and conduct the joint site inspection on December 10, 2015.

STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE
INSPECTION and [PROPOSED] ORDER THEREON

1 **IT IS SO STIPULATED.**

2 This stipulation may be executed in counterparts and have the same force and effect as
3 though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall
4 have the same force and effect as originals.

5 Respectfully submitted,

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7 Dated: November 24, 2015

THOMAS E. FRANKOVICH, Esq.
A PROFESSIONAL LAW CORPORATION

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12 Dated: November 24, 2015

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10 By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
Attorney for Plaintiff IRMA RAMIREZ

13
14 Dated: November 24, 2015

ATTORNEY AT LAW

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16 By: /s/ Marvin Pederson
Marvin Pederson
Attorney for Defendant Apena Corp.

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18 Dated: November 24, 2015

DICKENSON, PEATMAN & FOGARTY, P.C.

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20 By: /s/Joy Durand
Joy Durand
Attorney for Defendants Demetrios Giannis and
Rose Giannis

21 **PROPOSED ORDER**

22 **IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site
23 inspection of the premises be continued up to and including December 10, 2015.

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25 Dated: November 25, 2015

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28 STIPULATION RE CONTINUING DEADLINE FOR THE
INSPECTION and [PROPOSED] ORDER

